

15566

ORIGINAL  
(Red)

G-1241-ALC-105

August 27, 2001

Ms. Carlyn Winter Prisk (3HS11)  
USEPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029



**Re: Lower Darby Creek Area Site – Clearview Landfill, Folcroft  
Landfill, and Folcroft Landfill Annex, Darby Township, PA  
CERCLA 104(e) Request for Information**

Dear Ms. Prisk,

This letter is in response to your request via telephone call to Tara Trimpey on August 14, 2001 that The Boeing Company ("Boeing") reconsider its position regarding Question Nos. 5, 6 and 7 as provided in its July 2, 2001 response to the above-referenced CERCLA 104(e) Request for Information dated May 18, 2001 ("Response").

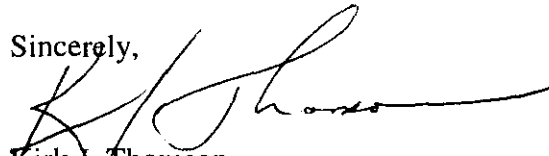
After due consideration of your request, Boeing has concluded that its Response is adequate and that no supplemental response is warranted. Boeing has no knowledge of any waste disposal at the subject site ("Site") and is unaware of any probative or credible information that would support a finding that it disposed of hazardous substances at the Site. EPA has provided a putative summary of statements made by an unidentified individual, alleging that disposal of unspecified materials occurred, but this statement is of questionable value given that it is unsworn hearsay, was not subject to any critical cross-examination, and fails to identify with any specificity the nature of the materials that were allegedly transported to the Site. As such, the information provided does not change the basis for Boeing's original response regarding Question Nos. 5, 6 and 7.

Moreover, to the extent that the provision of any responses would even be feasible, it would be inappropriate under the circumstances insofar as it would result in a speculative exercise lacking in probative value to this investigation. Even assuming that material was transported to the Site (which Boeing does not concede), without further detail or information, it would be impossible to characterize the nature of the specific material involved and what, if any, hazardous materials were contained therein. Therefore the generic information requested in Question Nos. 5, 6, and 7 could not have any probative value to the investigation of wastes identified at the Site.

ORIGINAL  
(Red)

Please feel free to contact Tara Trimpey at (314) 232-3269 if you have any questions or comments.

Sincerely,



Kirk J. Thomson  
Director, Environmental Affairs



Cc: Tara Trimpey  
Allen Kramer  
Jim King  
Alan Culwell